



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 20 2015

REPLY TO THE ATTENTION OF:

Via US Mail

Mr. Matthew Love
Excide Technologies
P.O. Box 14294
Reading, Pennsylvania 19612-4294

RE: Explanation of Significant Differences
Refined Metals Corporation
3700 South Arlington Avenue
Beech Grove, Indiana
IND 000 718 130

Dear Mr. Love,

On August 31, 1998, the Refined Metals Corporation (RMC) entered into a Consent Decree (CD) with the U.S. Environmental Protection Agency and the Indiana Department of Environmental Management (IDEM). The CD required RMC to close waste piles and a surface impoundment in accordance with IDEM requirements and conduct a corrective action program subject to EPA review and approval. RMC completed corrective action investigations and provided the results to EPA and IDEM.

EPA reviewed the investigation reports and on September 15, 2009, issued its Final Decision requiring RMC to implement remedial measures necessary to protect human health and the environment. As a final remedy, EPA required RMC to:

- Excavate contaminated media, including soils, sediment, and debris. Demolish several remaining facility structures, and consolidate the remediation waste into an on-site containment cell.
- Place an institutional control on the property to restrict land and groundwater use.
- Conduct monitored natural attenuation to restore contaminated groundwater on the facility.

RMC began implementing the final remedy in August, 2014. During excavation, RMC discovered more waste than was previously known, requiring that the additional material be placed into the on-site containment cell. On June 16, 2015, RMC requested EPA approval to expand the containment cell to provide capacity for the additional remediation waste. RMC

estimates that an additional 13,261 cubic yards of waste requires excavation and consolidation. RMC proposes to expand the containment cell to provide the additional capacity, using similar construction methods and materials as the original cell.

EPA has reviewed RMC's request and is approving the June 16, 2015, Request for Amendment to the Corrective Measures Design in accordance with paragraph 49 of the CD. RMC is responsible for ensuring continued compliance with the CD and all applicable provisions of RCRA, and the following conditions of approval:

1. Provide as-built drawings in the Corrective Measures Implementation Report.
2. Within 45 days of construction completion, RMC will provide a revised Operation and Maintenance Plan incorporating final design and monitoring requirements.

Any departure from the conditions of this approval must receive prior written authorization from this office. Further, these approvals do not relieve the Owner from compliance with any other Federal, State, or local regulatory requirements. If you have any questions regarding this approval, please contact Ms. Ohl by e-mail at ohl.tamara@epa.gov or by telephone at (312) 886-0991.

Sincerely,



Margaret M. Guerriero
Director
Land and Chemicals Division

Enclosure

cc: Ruth Jean, IDEM

EXPLANATION OF SIGNIFICANT DIFFERENCE

FOR THE

REFINED METALS CORPORATION

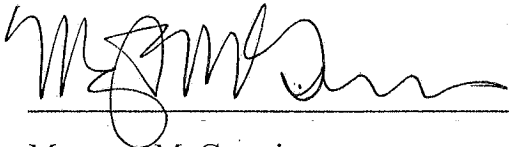
BEECH GROVE, INDIANA

IND 000 718 130

JULY, 2015

Issued by:

Date:



Margaret M. Guerriero
Director
Land and Chemicals Division
U.S. Environmental Protection Agency




TABLE OF CONTENTS

EXPLANATION OF SIGNIFICANT DIFFERENCE

Refined Metals Corporation

Beech Grove, Indiana

IND 000 718 130

- I. Purpose
- II. Facility Description and Selected Remedy
- III. Description of Change to the Selected Remedy
- IV. Statutory Determinations
- V. Public Participation Compliance

Figure

EXPLANATION OF SIGNIFICANT DIFFERENCE

Refined Metals Corporation

Beech Grove, Indiana

IND 000 718 130

I. PURPOSE

The U.S. Environmental Protection Agency issued a Final Decision and Response to Comments (Final Decision) on September 14, 2009, for the Refined Metals Corporation (RMC) facility, located in Beech Grove, Indiana. The Final Decision required RMC to excavate contaminated soils and sediments, demolish several remaining facility structures, and consolidate the remediation waste into an on-site containment cell. In addition, the Final Decision required RMC to place an institutional control on the property deed restricting the use of the land and groundwater, and to conduct a monitored natural attenuation program until the groundwater is restored.

This Explanation of Significant Difference (ESD) documents EPA's decision to significantly change part of the final remedy. The significant change to the remedy is the decision to expand the existing containment cell to receive a greater volume of remediation waste discovered during remedy implementation. The changes do not fundamentally alter the overall cleanup approach, and comply with the statutory requirements of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6901 et seq.

II. FACILITY DESCRIPTION AND SELECTED REMEDY

The Refined Metals Corporation (RMC) is located at 3700 South Arlington Avenue in Marion County, Beech Grove, Indiana. RMC received lead acid automotive and industrial batteries, and lead-bearing materials which were processed for lead recovery. RMC occupies approximately 24 acres of relatively flat land of which about 10 acres was formerly used for manufacturing. The facility was used for secondary lead smelting and refining operations from 1968 through 1995. On August 31, 1998, RMC entered into a Consent Decree with EPA and the Indiana Department of Environmental Management (IDEM) pursuant to Section 3008(a) of RCRA. The Consent Decree required RMC to close waste piles and a surface impoundment pursuant to a closure plan approved by IDEM, and investigate and remediate the facility in accordance with plans approved by EPA. RMC conducted the required investigations and provided the results to EPA and IDEM.

EPA evaluated the investigation results and determined that RMC must take remedial action to protect human health and the environment. In the Final Decision issued on September 15, 2009, EPA required RMC to:

- Excavate contaminated media, including soils, sediment, and debris, demolish several remaining site structures, and consolidate the remediation waste into an on-site containment cell. Hazardous waste units undergoing closure pursuant to IDEM requirements would also be consolidated into the containment cell;
- Place an institutional control on the property to restrict land and groundwater use; and
- Conduct monitored natural attenuation to restore contaminated groundwater on the facility.

EPA required RMC to cover the containment cell with an impermeable geomembrane cap, and conduct a long-term operation, maintenance and monitoring program for the containment cell. RMC prepared a Corrective Measures Design to complete the work required by IDEM and EPA.

III. DESCRIPTION OF CHANGE TO THE SELECTED REMEDY

RMC began the final remedy and closure implementation in August, 2014. During excavation, RMC discovered more waste that required remediation. By December, 2014, RMC had consolidated approximately 21,000 cubic yards of remediation waste into the containment cell and reached the cell's maximum capacity. On June 16, 2015, RMC provided a Request for Amendment to Corrective Measures Design (Amendment) to EPA and IDEM to expand the containment cell to accommodate the additional remediation waste. RMC estimates that approximately 13,261 cubic yards of remediation waste remains to be excavated and consolidated into a containment cell.

The expansion proposed by the Amendment will extend approximately 120 feet to the south and is identified in the Amendment as Containment Cell B (CCB). This expansion is sufficient to contain the amount of remediation waste remaining. However, if the additional volume of CCB also proves insufficient, excess soils may be sent off-site for disposal in accordance with federal, state, and local regulations. RMC may treat excess soils with hazardous characteristics onsite using reagents to reduce the leachability of metals from soils. Any treatment will be performed in-situ prior to removal.

CCB will be constructed in the same manner as the original containment cell. Consistent with the original containment cell design, CCB will be covered with a non-woven geotextile placed on the soil surface, a textured 60 mil HDPE geomembrane, double sided drainage net, and 18 inches of compacted soil fill. The cap cover soil, topsoil, and turf will also remain the same as presented in the final Corrective Measures Design for the containment cell.

Table 1
Summary of Significant Change to the Final Remedy

| Remedial Component | Original Remedy Design 2009 | Significant Difference Remedy Changes 2015 |
|--|----------------------------------|--|
| Estimated volume of soil, sediment, and debris | Approximately 21,000 cubic yards | Approximately 34,000 cubic yards |
| Containment Cell Capacity | Approximately 22,000 cubic yards | Approximately 37,000 cubic yards |

IV. STATUTORY DETERMINATIONS

EPA's approval of the containment cell expansion will provide RMC the additional capacity needed to complete the work originally required by IDEM and EPA. The remedy protects human health and the environment, and will comply with federal and state requirements that are applicable, and relevant and appropriate to this remedial action.

V. PUBLIC PARTICIPATION COMPLIANCE

This ESD and copies of other documents related to the corrective action program for RMC are available at:

- Beech Grove Public Library
1102 Main Street
Beech Grove, Indiana 46107
- U.S. EPA Region 5 Records Center
77 West Jackson Boulevard
Chicago, Illinois 60604

The significant change described in this ESD involves expanding the previously approved containment cell to accommodate additional remediation waste. The remediation waste is similar to that already consolidated within the existing containment cell. The expansion does not fundamentally alter the overall remedial design or objectives. Therefore, EPA has determined that a formal public comment period is not necessary. If you have any questions or concerns, please contact Ms. Tamara Ohl at (312) 886-0991, or via email at ohl.tamara@epa.gov.

ADMINISTRATIVE RECORD

EXPLANATION OF SIGNIFICANT DIFFERENCE

Refined Metals Corporation

Beech Grove, Indiana

IND 000 718 130

| Author | Date | Document |
|----------|--------------------|---|
| EPA/IDEM | August 31, 1998 | Consent Decree pursuant to Section 3008(a) of RCRA |
| EPA | September 14, 2009 | Final Decision and Response to Comments |
| RMC | September 6, 2013 | Final Corrective Measures Design |
| RMC | June 16, 2015 | Request for Amendment to Corrective Measures Design |

